

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Zohar III, Corp., *et al.*,¹

Debtors.

ZOHAR CDO 2003-1, LIMITED; ZOHAR II 2005-1, LIMITED; and ZOHAR III, LIMITED; ZOHAR II 2005-1, CORP.,

Plaintiffs,

-against-

PATRIARCH PARTNERS, LLC; PATRIARCH PARTNERS VIII, LLC; PATRIARCH PARTNERS XIV, LLC; PATRIARCH PARTNERS XV, LLC; PHOENIX VIII, LLC; OCTALUNA LLC; OCTALUNA II LLC; OCTALUNA III LLC; ARK II CLO 2001-1, LIMITED; ARK INVESTMENT PARTNERS II, LP; ARK ANGELS VIII, LLC; PATRIARCH PARTNERS MANAGEMENT GROUP, LLC; PATRIARCH PARTNERS AGENCY SERVICES, LLC; and LYNN TILTON,

Defendants, and

180S, INC.; BLACK MOUNTAIN DOORS, LLC; CROSCILL HOME, LLC; DURO TEXTILES, LLC; GLOBAL AUTOMOTIVE SYSTEMS, LLC; HERITAGE AVIATION, LTD.; INTREPID U.S.A., INC.; IMG HOLDINGS, INC.; JEWEL OF JANE, LLC; MOBILE ARMORED VEHICLES, LLC; SCAN-OPTICS, LLC; SILVERACK, LLC; STILA STYLES, LLC; SNELLING STAFFING, LLC; VULCAN ENGINEERING, INC; and XPIENT SOLUTIONS, LLC,

Nominal Defendants.

Chapter 11

Case No. 18-10512 (KBO)

Jointly Administered

Adversary No. 20-50534 (KBO)

Re: Adv. Docket No. 193

¹ The “Debtors,” and, where applicable, the last four digits of their taxpayer identification number are as follows: Zohar III, Corp. (9612), Zohar II 2005-1, Corp. (4059), Zohar CDO 2003-1, Corp. (3724), Zohar III, Limited (“Zohar III”) (9261), Zohar II 2005-1, Limited (“Zohar II”) (8297), and Zohar CDO 2003-1, Limited (together with Zohar II and Zohar III, the “Zohar Funds” or the “Funds”) (5119). The Debtors’ address is c/o FTI Consulting, Inc., 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

PATRIARCH PARTNERS VIII, LLC; PATRIARCH PARTNERS XIV, LLC; PATRIARCH PARTNERS XV, LLC; OCTALUNA LLC; OCTALUNA II LLC; OCTALUNA III LLC; PATRIARCH PARTNERS AGENCY SERVICES, LLC; and PATRIARCH PARTNERS, LLC,

Counterclaim and Third-
Party Claimants,

-against-

ZOHAR CDO 2003-1, LIMITED; ZOHAR CDO 2003-1, CORP.; ZOHAR II 2005-1, LIMITED; ZOHAR II 2005-1, CORP.; ZOHAR III, LIMITED; ZOHAR III, CORP.,

Counterclaim and Third-
Party Defendants.

**CERTIFICATION OF NO OBJECTION REGARDING DEFENDANTS'
MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE FILING OF
PORTIONS OF DEFENDANTS' SECOND AMENDED ANSWER TO
THE CORRECTED SECOND AMENDED COMPLAINT AND DEFENDANTS'
AMENDED COUNTERCLAIMS AND THIRD-PARTY CLAIMS**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the **Defendants' Motion for Entry of an Order Authorizing the Filing of Portions of Defendants' Second Amended Answer to the Corrected Second Amended Complaint and Defendants' Amended Counterclaims and Third-Party Claims** [Adv. Docket No. 193] (the "Motion"), filed on July 29, 2022. The undersigned further certifies that he has reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to Local Rule 7007-1(ii), objections to the Motion were to be filed and served no later than August 12, 2022 (the "Objection Deadline").

The Objection Deadline has passed and no objections appear on the docket or were served upon the undersigned counsel. It is hereby respectfully requested that the proposed order attached to the Motion be entered at the convenience of the Court.

Dated: August 25, 2022

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore

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